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June 17, 2005

FACSIMILE AND FIRST CLASS MAIL

Paul D. Popeo, Esq.
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Exchange Place
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Re *ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al.*,
Civil Action No. 04-10353 PBS
Our File 2639/509

Dear Paul:

I write to follow up on your representation during yesterday's deposition of Manfred G. Grabherr that you would search for Dr. Grabherr's employment contract with Kurzweil. ScanSoft's Document Request No. 32 to VST and Document Request No. 10 to Dr. Grabherr both request production of:

Each document concerning trade secrets of ScanSoft (or its predecessors, including without limitation Dragon Systems and Lernout & Hauspie) that were in the possession of or known to [Laurence S. Gillick, Robert S. Roth, Jonathan P. Yamron, or Manfred G. Grabherr] at the time they became employees of Voice Signal. (Emphasis added).

Dr. Grabherr stated that Kurzweil was acquired by Lernout & Hauspie shortly after he became employed by Kurzweil. Grabherr Transcript at pp. 53-57.

Furthermore, Document Request No. 13 to Dr. Grabherr requests production of:

Each document, including but not limited to documents in electronic format and/or source code, in your possession at the time you became an employee of Voice Signal that was related to your employment at Lernout & Hauspie and/or your work on Speech Recognition Products at Lernout & Hauspie.

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Dr. Grabherr's employment contract with Kurzweil is relevant to work he did at Lernout & Hauspie. Please supplement the defendants' responses by providing a copy of Dr. Grabherr's employment contract.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca L. Hanovice", with a stylized flourish at the end.

Rebecca L. Hanovice

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